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Group Health Plans and Health Insurance Issuers: Internal Claims and Appeals and External Review Processes

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Submitter Information

Name: Ivan A Valdes

Address:

1059 NE Parkview Ct
Bend,, OR, 97701

Email: valdesigo@gmail.com

Organization: Mosaic Medical

General Comment

On behalf of myself, as an Outreach Worker, I wish to comment on the 10% threshold for translation and oral interpretation of private plan materials in the internal review and appeals contexts. I am an outreach worker who helps hundreds of individuals who contribute financially through taxes and have no way of connecting with their PCPs due to language barriers. Their possibilities to follow up with medical treatments, Rx instructions, etc will be affected tremendously if this petition passes. The 10% standard is far too high. A more appropriate standard would be "5% of the plan's population or 500 persons in plan's service area, whichever is less" for large group plans, and 25% of population for small plans. Oral interpretation should be provided in all languages at all times. We proudly announce to the world that this is a country formed by immigrants. As a consequence so, let us be true to that statement, and while our immigrants work had to maintain their families and learn our language let us help them to achieve those goals because by doing this it WILL make an America more productive and healthier!